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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT CALIFORNIA
WESTERN DIVISION**

)
CENTER FOR BIOLOGICAL)
DIVERSITY; WISHTOYO)
FOUNDATION,) Case No. 2:24-cv-05459
)
Plaintiff,)
v.)
DEBRA HAALAND, in her official)
capacity as Secretary of the United States)
Department of the Interior; BUREAU OF)
SAFETY AND ENVIRONMENTAL)
ENFORCEMENT, BRUCE HESSON,)
Pacific Regional Director, Bureau of Safety)
and Environmental Enforcement,)
)
Federal Defendants.)
)

I, Bobby Kurtz, state the following:

1. I am currently the Regional Supervisor for the Office of Production and Development (“OPD”) for the Pacific Outer Continental Shelf Region, within the Bureau of Safety and Environmental Enforcement (“BSEE”) in the United States Department of the Interior. I have been employed by BSEE for 13 years. I have served in my current capacity since 2019 and previously served as Chief of the Reservoir Development Section.

2. As the Regional Supervisor for OPD, I am responsible for enforcing the regulations in 30 CFR 250, Subparts K-M, covering oil and gas production requirements, oil and gas production measurement, surface commingling and security, and unitization. I am also responsible for enforcing the lease activity components of Subpart A, general activities. These lease activity components include primary lease requirements, lease term extensions, suspensions, and lease cancellations. Additionally, OPD is responsible for providing technical support for aspects of other 30 CFR 250 Subparts, including the assessment of subsurface geohazards.

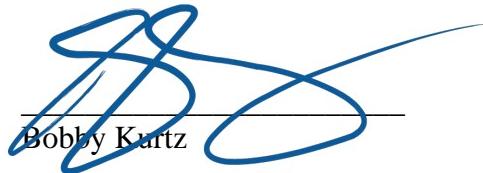
3. Among the above-stated duties, I am also responsible for overseeing the compilation of documents for the Administrative Record underlying the above-captioned case. In this capacity, I requested and inspected records and files from the BSEE Pacific regional office that pertain to the lease extension issue in this case.

4. To the best of my knowledge and based on my personal observation and/or inquiries of other BSEE employees, I hereby certify that the attached Administrative Record is a true, correct, and complete copy of the documents that were directly or indirectly considered to reach the challenged November 2023 lease suspension decision and constitute the complete Administrative Record for this matter. I also certify that the attached documents that comprise

the record constitute true, accurate, and complete copies of the original documents listed in the Index.

5. I swear under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing information is true, accurate, and complete.

Respectfully submitted this 6th day of November 2024.



A handwritten signature in blue ink, appearing to read "Bobby Kurtz". The signature is fluid and cursive, with a horizontal line underneath it.